



Change. Not Charity.

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April 4, 2008

VIA FACSIMILE & U.S. MAIL

Chairman Ross Johnson
Fair Political Practices Commission
428 J Street, Suite 620
Sacramento, CA 95814
(916) 322-6440

Re: Permanent Adoption of Emergency Regulation 18413

Dear Chairman Johnson,

I write on behalf of the Liberty Hill Foundation regarding the permanent adoption of Emergency Regulation 18413.

The Liberty Hill Foundation is a charity that partners with organizations committed to combating poverty and injustice, and creating safety, equality and opportunity for everyone who lives in Los Angeles County. We provide training and education to grantees, connect foundation donors to exciting grassroots campaigns, and help shape public debate on important issues.

One of our core beliefs is the importance of building civic engagement among low income communities and creating a culture of nonpartisan electoral engagement among Los Angeles' social and economic justice organizations. We provide educational forums to educate our grantees about the relevance of electoral engagement and teach nonpartisan electoral skills such as voter registration, get-out-the-vote, voter list use, election law, and voter rights. We produce educational materials such as nonpartisan voter guides that explain the issues on the ballot. We also provide grants to help organizations to engage, educate, and organize voters.

We urge you to include 501 (c) (3) public charities in Regulation 18413's definition of "multipurpose" groups whose burden of disclosure requirements when engaging in some type of ballot measure activity will be reduced under Regulation 18413. In our view, not including 501 (c) (3) organizations as "multipurpose" groups eligible for event-based reporting is contrary to the court's decision in *California Pro-Life Council, Inc. v. Randolph*, which did not distinguish 501(c) (3) organizations in its opinion. We urge you to reconsider this issue and allow the alternative reporting to be available to these organizations.

Sincerely yours,

Margarita Ramirez
Deputy Director of Grantmaking
Liberty Hill Foundation, Santa Monica